IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

JANE DOE,

Plaintiff,

v.

Case No. 20C0856

BOARD OF REGENTS OF THE UNIVERSITY OF WISCONSIN SYSTEM,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

The Defendant, Board of Regents of the University of Wisconsin System, by its attorneys, Wisconsin Attorney General Joshua L. Kaul and Assistant Attorneys General Rachel L. Bachhuber, Jonathan J. Whitney, and Catherine R. Malchow, hereby moves the Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure for an order of summary judgment against the claims of Plaintiff, Jane Doe. The grounds for this motion are set forth in the accompanying brief and the supporting documents.

Plaintiff is hereby notified that if she does not oppose the moving party's proposed facts that properly rely on evidentiary submissions in the record, the Court will accept the facts as unopposed. Plaintiff is directed to Federal Rule of Civil Procedure 56 and the procedures set forth in this Court's Preliminary Pretrial Conference Order governing summary-judgment procedure.

Dated: April 8, 2022

Respectfully submitted,

JOSHUA L. KAUL Attorney General of Wisconsin

s/Rachel L. Bachhuber RACHEL L. BACHHUBER Assistant Attorney General State Bar #1052533

s/Catherine R. Malchow CATHERINE R. MALCHOW Assistant Attorney General State Bar #1092705

s/Jonathan J. Whitney JONATHAN J. WHITNEY Assistant Attorney General State Bar #1128444

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